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 Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)	
)	2:19-cr-00265-RFB-VCF
Plaintiff,)	
)	(Third Request)
vs.)	
)	
DANIELLE ESPARZA,)	
)	
Defendant.)	

Certification: This Stipulation and Order is being timely filed.

STIPULATION TO CONTINUE SENTENCING

IT IS HEREBY STIPULATED AND AGREED, by Defendant DANIELLE ESPARZA, by and through her attorney, LANCE A. MANINGO, ESQ., and the United States of America, by and through KEVIN SCHIFF, Assistant United States Attorney, that the sentencing hearing currently scheduled for March 18, 2021, at 9:00 a.m. be vacated and continued to a date and time convenient for this Court; however, in no event earlier than thirty (30) days from the present date of sentencing.

This Stipulation is entered into for the following reasons:

1. The parties agree to continue the sentencing date as co-defendant Hurtado is still pending sentencing;
2. That Defendant ESPARZA is in custody and does not object to this continuance;

1 3. That denial of this request for a continuance could result in a miscarriage of
2 justice; and

3 4. This is the third request for a continuance of the sentencing date in this case.

4 RESPECTFULLY SUBMITTED this 9th day of March, 2021.

5 By: /s/ Lance Maningo
6 LANCE A. MANINGO, ESQ.
7 Attorney for Defendant ESPARZA

8 By: /s/ Kevin Schiff
9 KEVIN SCHIFF, AUSA
10 Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)
) 2:19-cr-00265-RFB-VCF
 Plaintiff,)
) (Third Request)
 vs.)
)
 DANIELLE ESPARZA,)
)
 Defendant.)

FINDINGS OF FACTS

Based upon the pending Stipulation of the parties, and good cause appearing therefore,
 the Court finds that:

This Stipulation is entered into for the following reasons:

1. The parties agree to continue the sentencing date as co-defendant Hurtado is still pending sentencing;
2. That Defendant ESPARZA is in custody and does not object to this continuance;
3. That denial of this request for a continuance could result in a miscarriage of justice; and
4. This is the third request for a continuance of the sentencing date in this case.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of
 the public and the defendant, since the failure to grant said continuance would be likely to
 result in a miscarriage of justice.

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ORDER

IT IS THEREFORE ORDERED that sentencing in this matter currently scheduled for March 18, 2021 at 9:00 a.m. be vacated and continued to April 29, 2021 at 9:00 AM in the above-noted Court.

DATED this 10th day of March, 2021.




RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

 **MANINGO LAW**
Est. 2002

By: /s/ Lance Maningo
Lance A. Maningo
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Attorney for Defendant ESPARZA

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